



**THE CITY OF NEW YORK
LAW DEPARTMENT**

100 CHURCH STREET
NEW YORK, NY 10007

ZACHARY W. CARTER
Corporation Counsel

ALISON S. MITCHELL
Assistant Corporation Counsel
Phone: (212) 356-3514
Fax: (212) 356-3558
amitchel@law.nyc.gov

September 11, 2017

By ECF

Honorable Ronald L. Ellis
United States District Court
Southern District of New York
500 Pearl Street
New York, New York 10007

Re: George Packard, et al. v. City of New York, et al.
15 Civ. 7130 (AT) (RLE)

Your Honor:

I am an Assistant Corporation Counsel in the Office of Zachary W. Carter, Corporation Counsel of the City of New York, and one of the attorneys assigned to represent defendant City of New York in the above-referenced matter. While defendant is loath to write to the Court again, defendant opposes Plaintiff's request for sanctions. Plaintiff's request for sanctions does not comply with the Federal Rules of Civil Procedure under Rule 11(c). Defendant respectfully refers the Court to its letter dated August 31, 2017 (Docket Entry 89) which addresses Plaintiff's contentions asserted in their most recent letter to the Court dated September 8, 2017 (Docket Entry 91).

Thank you for your consideration herein.

Respectfully submitted,

/s/

Alison S. Mitchell
Assistant Corporation Counsel

cc: All counsel VIA ECF